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February 6, 2019

Connie Chen Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #15 for the Santa Barbara County Reliability Project

Dear Ms. Chen,

This report provides a summary of the compliance monitoring activities that occurred during the period from **December 1 through 31, 2018**, for the Santa Barbara County Reliability Project (SBCRP) in Ventura County and Santa Barbara County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Edison (SCE) and its contractors are in compliance with the requirements of the Final Environmental Impact Report (Final EIR) for the SBCRP, as adopted by the California Public Utilities Commission (CPUC) on November 5, 2015.

The CPUC has issued the following Notices to Proceed (NTPs) for the SBCRP to SCE:

- NTP #1 (October 21, 2016): Establishment and operation of staging yards in Ventura County.
- NTP #2 (May 23, 2017): Construction of subtransmission, substation, and telecommunication related components in Ventura County.
- NTP #3 (May 23, 2017): Construction of subtransmission, substation, and telecommunication related components in Ventura County and Santa Barbara County, and staging yards in Santa Barbara County.

Onsite compliance monitoring by the Ecology and Environment, Inc. (E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Vince Semonsen visited the SBCRP construction sites on **December 14**, **2018**. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for each site visit. A report is attached below (Attachment 1).

Overall, the SBCRP has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP's) Compliance Plan. Communication between the CPUC/E & E compliance team and SCE has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between CPUC/E & E and SCE, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, SCE's monthly compliance status report for December 2018 provided a compliance summary and included: a description of construction activities from December 1 to 31, 2018; a detailed look-ahead construction schedule; a summary of compliance with project

commitments (MMs/APMs) for biological, cultural, and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Program (WEAP); environmental preparation for future work phases; and a list of recent SBCRP approvals and outstanding agency deliverables.

Compliance Incidents

During the December 2018 reporting period, there were no major compliance incidents. However, biological monitors reported observations of one dead red-tailed hawk with no visible injuries, a fallen branch from a coast live oak tree (possibly caused by heavy rain and wind), and a hydroseeding truck antifreeze spill. The area affected by the antifreeze spill was inside approved disturbance limits and approximately 100 feet of the road was affected. Absorbent pads were promptly used to remove pooled antifreeze from pavement, and absorbent clay granules were spread on larger stained areas and later swept and removed. No antifreeze contacted soil and no resources were impacted. Biological monitors also observed contaminated soil beneath an H&M excavator along a project access road. The area affected was surveyed and was completely inside approved disturbance limits. A drip pan with an absorbent sock was placed underneath the excavator to contain the leak until a mechanic could fix the leak. An H&M crew member dug the contaminated soil (approximately 0.1 cubic feet) and placed it inside of a bag for removal and proper disposal. A mechanic fixed the leak by the following morning, and no resources were impacted by the incident. In addition, other non-project related observations included motorcycle tracks, installation of a McCarthy drain with Natina treatment, road grading, and several post-Thomas fire restorations work on access roads.

Public Concerns

SCE continued discussions with landowners in the vicinity of project components. In December, SCE performed asphalt repair on roads located near concerned property owners (the property owners requested asphalt road repairs via a letter in November).

Minor Approvals

During December 2018, no email or minor approvals were issued.

Sincerely,

Fernando Guzman Project Manager, Ecology and Environment, Inc.

cc: Kenneth Spear, SCE Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Report December 14, 2018



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	December 14, 2018
Project Proponent:	Southern California Edison	Report #:	VS036
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	AM/PM Weather:	Overcast and cool temperatures with a slight breeze
E & E CM:	Fernando Guzman	Start/End time:	0630 to1200
Project NTP(s):	NTP-1, NTP-2, NTP-3, NBMP, NIW	/CP	

SITE INSPECTION CHECKLIST (Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (BMPs) been installed?	Х		
Are erosion and sediment control measures (BMPs) properly installed (without apparent deficiencies) and functioning as intended during rain events?	Х		
Are measures in place to avoid/minimize mud tracking onto public roadways, in accordance with the project's SWPPP?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, dirt piles are tarped, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures are in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 mph on unpaved roads?	Х		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

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Are excavations and trenches covered at the end of the day?	Х		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?			Х
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas? If yes, describe below.		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Х	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features?	Х		
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			х
Are archaeological and paleontological monitors onsite, if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are required fire prevention and control measures in place?	Х		
Are contaminated soils properly managed for onsite storage or offsite disposal?	Х		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?			Х
Is construction occurring within approved hours?	Х		
Are required noise control measures in place?	Х		

AREAS MONITORED (i.e., structure numbers, yards, or substations)

Segments 1 and 2

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I arrived onsite and met with lead environmental biologist James Rasico at 0630 at the intersection of Highway 150 and Red Mountain Road. We traveled to the Santa Clara Substation at the eastern end of Segment 1. James Rasico was conducting quarterly revegetation evaluations at 14 locations along Segments 1 and 2. This entailed evaluating plant cover and diversity along with taking photos at prearranged photo points. Each of these locations was an area where additional disturbance took place outside of the tower locations. I was able to assist with photos and the determination of plant cover estimations. It had been quite a while since I last inspected these two segments.

Our initial stop was at TSP 201 E near the Substation – Photos 1 & 2. This area was trenched for conduit pipe installation that ran between the Substation to the tubular steel pole (TSP). The disturbed area appeared to be well vegetated and stabilized.

Our second stop was at TSP 204, where a small ramp of soil was pushed near the TSP – Photo 3. This location had minimal cover.

At our third location, a steep slope near TSP 211 was hydroseeded and covered with a coconut blanket – Photo 4. Plant cover was low, but a large number of diverse seedlings were growing through the erosion blanket.

Our fourth pole location was at TSP 216, where a cut bank was being revegetated. Plant growth was slow, but the area appeared stable – Photo 5.

Our last stop along Segment 1 was at the Getty Tap, where a cluster of towers are located – Photo 6. During construction, crews walked into the area around guard poles; the trails were part of the quarterly evaluation. The revegetation was excellent, and it was difficult to identify where the trails were located.

We inspected several locations toward the east end of Segment 2. Many of them were located near the Ventura River. We were denied access to a portion of Segment 2 since we did not have the proper identification. James Rasico attempted to reach the remaining locations via another route after I left the project site.

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BIO-5. Report only on MMs pertinent to your observations today)

See the mitigation measures (MMs) listed in the observed activities descriptions. All construction personnel appear to have completed Worker Environmental Awareness Program (WEAP) training (APM GEN-1).

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)

COMPLIANCE SUMMARY Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have
occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.
Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources fyou checked this box, describe the incident below and follow-up to ensure correction.
Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.
Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.
Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include SCE report identification number.

Date	Non-Compliance Issue and Resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESEN	NTATIVE SITE PH	OTOGRAPHS	
Date	Location	Photo	Description
12/14/18	SBCRP – Segment 1 TSP 201 E		Photo 1 – Restored and revegetated area near the tower.
12/14/18	SBCRP – Segment 1 TSP 201 E		Photo 2 – Restored and revegetated slope down towards the Substation, located near the tower.

REPRESEN	NTATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/14/18	SBCRP – Segment 1, TSP 204		Photo 3 – Revegetation of a small ramp of soil.
12/14/18	SBCRP – Segment 1, TSP 211		Photo 4 – Revegetation evaluation of a disturbed area near the TSP.

REPRESEN	ITATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/14/18	SBCRP – Segment 1, TSP 216		Photo 5 – Evaluation of revegetation.
12/14/18	SBCRP – Segment 1, Getty Tap area		Photo 6 – Revegetation was completed over some walking trails around the guard poles.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	12/26/18

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	12/27/18